

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

KIMBERLY F. BRIGGS, )  
                          )  
Plaintiffs,           )  
                          )  
v.                     )                      Cause No. 4:22-cv-00282-DDN  
                          )  
                          )  
CITY OF ST. LOUIS, *et al.*, )  
                          )  
Defendants.           )

**MOTION TO DISMISS  
PLAINTIFF'S SECOND AMENDED COMPLAINT**

COME NOW the City of St. Louis, Lyda Krewson, and Dale Glass, by and through the undersigned, and pursuant to Federal Rule of Civil Procedure 12(b)(6) hereby move the Court dismiss Plaintiff's Second Amended Complaint [Doc. 36] and causes of action asserted therein for failure to state a claim for which relief can be granted. In support of this Motion, Defendants file herewith a Memorandum in Support, which is incorporated by this reference as set forth fully herein.

WHEREFORE, Defendants City of St. Louis, Lyda Krewson, and Dale Glass move the Court dismiss this cause with prejudice, and for such other and further relief as this Court deems just and proper.

Respectfully submitted,

**SHEENA HAMILTON  
CITY COUNSELOR**

By: /s/ Abby Duncan

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and complete copy of the foregoing was served upon all counsel of record on this 27th day of December, 2022, by filing same in the Court's electronic filing system.

/s/ Abby Duncan